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REGION 10

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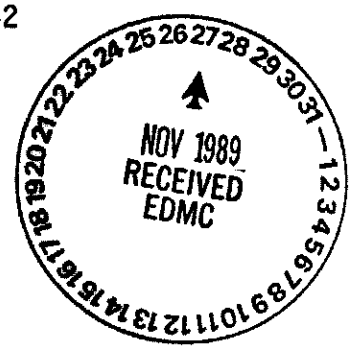
Richland, Washington 99352

November 2, 1989

8904742

REPLY TO ATTN OF: A7-70



Robert K. Stewart
Unit Manager
U.S. Department of Energy
P.O. Box 550 (A6-50)
Richland, Washington 99352

Re: Comments on the 300-FF-1 Operable Unit Work Plan, Attachment 1b, Quality Assurance Project Plan.

Dear Mr. Stewart:

The U.S. Environmental Protection Agency (EPA) Region 10 Quality Assurance Management Office has completed its review of Attachment 1b to the 300-FF-1 Operable Unit work plan, "Quality Assurance Project Plan" (QAPP). The comments provided in the enclosure pertain specifically to the QAPP and not to the Sampling and Analysis Plan (SAP) or other work plan sections. This transmittal also closes Action Item #ST4.4 from the October 13, 1989 Special Topic meeting on "Analytical Data Quality."

If any of the comments are unclear or if any issues need clarification or discussion, I can be reached at (509) 376-3883 or FTS 444-3883.

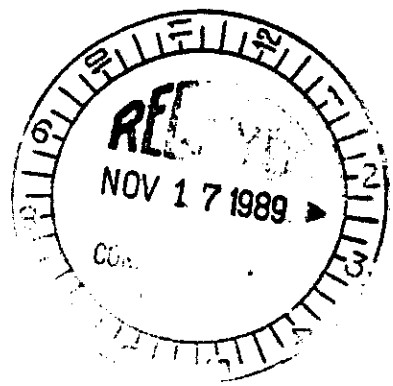
Sincerely,

David R. Einan
Unit Manager

Enclosure

cc: (with enclosure)

M. Thompson/R. Freeberg, DOE
R. Stanley/L. Goldstein, Ecology
M. Schlender, EPA
L. Hulstrom, WHC
Administrative Record File (300-FF-1)



Comments on the 300-FF-1 Operable Unit Work Plan
Attachment 1b: Quality Assurance Project Plan

November 2, 1989

1. Table 1., pages SAP/QAPP-7 and -8, lists the Analytical requirements for the wok plan activities. Only in the case of the "Ion Analysis" are values for detection limits, precision, accuracy, etc., listed. Furthermore, footnote (f) below the table explains that these issues will be resolved by "approved Westinghouse Hanford or Westinghouse Hanford-approved participant contractor or subcontractor procedures". This comment also relates to Section 7.0 of the QAPP.

   The missing requirements from Table 1 are essentially the Data Quality Objectives (DQO's) for the project, expressed in quantitative term. In their absence, how can there be an assessment of whether the DQO's and data requirements of the project have been accomplished? Understanding that this phase of the project is preliminary, the DQO's can still be specified from knowledge or common performance of the method indicated. In later stages of the project (as described in 1.0 of the QAPP) these missing quantitative factors will likely be selected on a risk-based assessment.

2. Section 8.0 describes the project activities concerning data reduction, validation, and reporting. As explained in the section, data examination and validation will be the responsibility of the analytical laboratory used with subsequent review by the Westinghouse Technical Lead. In addition, requirements for the evaluation of the data will be specified outside the project QAPP, but within the QA Plan of the lab.

   This approach to data assessment (within the lab and described outside of the QAPP) is not appropriate. Any data assessment and review should be performed as independently as possible from those generating the data.

3. The criteria listed in Section 8.0 for the Level III and V organic and inorganic analyses could be inappropriate for the data generated. For example, most methods listed in Table 1 are methods selected from outside the Superfund CLP. While methods outside the CLP are certainly valid, they do not clearly specify documentation to be generated by the lab to allow data validation to be performed. Furthermore, the Work Plan guidelines used for the validation were written for a specific CLP Statement of Work (SOW) and the criteria used in this guidance may not apply to the methods listed in Table 1. The major questions which are unanswered relate to

the laboratory instructions matching the documentation and criteria used for data validation.

4. What is the function of the final Westinghouse Hanford Technical Lead reviewer?

5. At what stages and under what convention will data qualifiers be assigned?

6. Section 12.0 further describes data assessment procedures and references Section 8.0 for specific activities. Since DQO's have not been fully established in this work plan, how can the Technical Lead determine whether the DQO's have been met?

7. Section 10.0 describes the project auditing activities. This section does not indicate how data storage and retrieval capability will be evaluated. Since a great deal of supporting information will be stored rather than reported with the sample results, the data storage and retrieval functions should be tested early in the project to avoid any delays or losses of information.

8. Are the requirements of the on-site lab, mentioned on page WP-145, the same as those laboratories considered in the QAPP?

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cc: J. L. Waite

Subject Comments on the 300-FF-1 Operable Unit Work Plan, Attachment 1b, Quality Assurance Project Plan

11/14/89JLW:dh

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